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ABSTRACT

The Healthy Meals for Healthy American Act of 1994 requires that a variety of meal-planning approaches be available for schools to plan menus. The United States Department of Agriculture (USDA) regulation "School Meals Initiative for Healthy Children," published in 1995, implements the provisions of the 1994 legislation and incorporates other proposals. The changes updated the nutrition standards for school meals, providing a variety of menu-planning alternatives and streamlining administration. This guidebook provides information to help school food-service professionals decide which menu-planning system best meets their needs. The book describes options for meeting the dietary guidelines for food-based menu planning, NuMenus, and Assisted NuMenus; presents information on compliance with nutritional standards; and compares the previous requirements with the new provisions. "Nutrition Power," a comprehensive training initiative to improve the learning readiness and lifelong nutritional health of Wisconsin children, is also described. Information on computer-hardware requirements and USDA-approved software for nutrient analysis is provided. (LMI)

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SCHOOL MEALS FOR HEALTHY CHILDREN

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Meeting the Dietary Guidelines for Americans and complying with the requirements of the Healthy Meals for Healthy Americans Act

Prepared by the Wisconsin Department of Public Instruction's Bureau for Food and Nutrition Services

John T. Benson, State Superintendent

EA 027201

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INTRODUCTION

NUTRIENT STANDARD MENU PLANNING

The Healthy Meals for Healthy Americans Act of 1994 requires that a variety of meal planning approaches be available for schools to plan menus.

The USDA regulation "School Meals Initiative for Healthy Children," published on June 13, 1995, implements the provisions of the Healthy Meals for Healthy Americans Act and incorporates earlier proposals that solicited comments on changes to the National School Lunch Program (NSLP) and School Breakfast Program (SBP). These changes included updating the nutrition standards for school meals, providing a variety of menu planning alternatives and streamlining program administration.

According to USDA, the new regulation:

Promotes Children's Health

- Ensures that meals promote the health of children by updating nutrition standards to reflect the 1990 *Dietary Guidelines for Americans*: eat a variety of foods; choose a diet low in fat, saturated fat, and cholesterol; select plenty of vegetables, fruits and grain products; use salt and sodium only in moderation
- Establishes one-third of Recommended Dietary Allowances for the NSLP and one-fourth for the SBP for protein, Vitamins A and C, iron, calcium and calories
- Varies minimum levels of nutrients and calories by age/grade groups

Provides Alternatives While Ensuring Accountability

- Provides three alternatives for menu planning for participating schools: NuMenus, Assisted NuMenus and food-based. If additional alternatives become available, school nutrition personnel will be advised.
- Allows use of NuMenus or Assisted NuMenus which base menu planning on nutrient analysis
- Allows use of food-based menu planning with minimum component quantities of meat/meat alternate, vegetables/ fruits, grains/breads and milk
- Measures compliance over a school week
- Requires implementation of Dietary Guidelines by School Year 1996-97 unless waived by the State agency to no later than School Year 1998-99
- Allows schools with accurate counting and claiming systems to develop their own system of internal controls in lieu of the specific edit checks
- Allows schools to discontinue any variety of milk that was consumed by less than one percent of students
- Enables schools to satisfy student preferences under the Offer vs. Serve option (see page 19)

Stresses Technical Assistance & Training, Not Fiscal Sanctions

- Provides a monitoring system based on corrective action and technical assistance, not fiscal penalties
- Extends cycle for administrative reviews from four to five years to promote technical assistance

For a copy of the complete June 13, 1995, regulation, contact the Bureau for Food and Nutrition Services, at (608) 267-9228.

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DIETARY GUIDELINES AND HEALTHFUL EATING

NUTRITION STANDARDS IN SCHOOL MEAL PROGRAMS

What are the nutrition standards for school meals?

School lunches must provide one-third of the Recommended Dietary Allowances (RDA) for protein, calcium, iron, vitamin A and vitamin C and one-third of the Recommended Energy Intake (REI) for calories over a week's cycle of menus. School breakfasts must provide one-fourth of the RDA and REI. In addition, school meals must comply with the applicable recommendations of the most current *Dietary Guidelines for Americans*, including limits on fat (30 percent of total calories) and saturated fat (less than 10 percent of total calories). Three different meal planning options are available to help schools meet these nutrition standards.

How do the new standards differ from the previous requirements?

Traditionally, school lunches were intended to address problems stemming from under consumption of nutrients. Lunches were designed so that the nutrients, averaged over a period of time, would approximate one-third of the Recommended Dietary Allowances (RDA) for children. No specific regulatory standard existed for breakfasts, but the general goal was one-fourth of the RDA.

Current nutrition research has established that over consumption of certain dietary components such as cholesterol, fat and saturated fat can also have severe consequences for future health and well-being. Therefore, USDA updated the nutrition standards to include compliance with the recommendations of the Dietary Guidelines. This updating constitutes the first major overhaul of nutrition standards in the nearly 50-year life of the School Lunch Program and will place the program at the center of preventive health care for children.

Why didn't USDA establish specific levels for sodium, cholesterol, and dietary fiber?

USDA did not establish quantified standards in these areas because the Dietary Guidelines do not do so. If future revisions in the Guidelines establish numeric targets, the nutrition standards for school meals will also be changed. The new regulations do require schools to review the sodium, cholesterol and dietary fiber content of their meals and make improvements when necessary.

Why didn't USDA include such nutrients as niacin, thiamine, riboflavin and other nutrients for which RDAs exist in the standards?

The five nutrients included in the standards were chosen because they are the key nutrients that promote growth and development. They are consistent with those required by the Food and Drug Administration to be on nutrition labels and, therefore, can be easily identified by meal planners. It should be noted, however, that many of the nutrients that are not being tracked tend to travel with those that are. As long as a variety of foods that deliver the required nutrients are being served, the others are likely to be available in adequate amounts.

Why are the nutrient levels and portion requirements for children in grades K-6 different from those used for grades 7-12?

USDA adopted two grade groupings because older children need a higher level of nutrients and calories than younger children. Therefore, both NuMenus and the food based menu planning system were structured to require higher levels of nutrients for children in grades 7-12. While some schools will have grade structures different from K-6 and 7-12, the new age/grade groupings may conform more closely to the standard structures of elementary and secondary schools than do the groupings in the current meal pattern. Schools electing to use NuMenus are also encouraged to employ an optional set of age groupings within the two required groups in order to fine tune the nutrition requirements for all children. Proper portion control helps avoid excessive fat in the diets of young children while ensuring adequate energy in the diets of older students.

Three options allow schools a range of methods for meeting the revised nutrition standards. Each option has its

own distinct advantages. How important these advantages are depends on the nature of the school and its meal service.

The following information is provided to help school food service professionals decide which menu planning system best meets their needs. School districts can choose more than one system if the needs of schools within the district vary. If additional systems are approved, school nutrition personnel will be advised.

For a comparison of the old versus new systems, please refer to pages 16 to 20 of this publication.

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OPTIONS FOR MEETING THE DIETARY GUIDELINES

FOOD BASED MENU PLANNING SYSTEMS

What is a food-based menu planning system?

The food based menu planning system in USDA's new rule is similar to the traditional meal pattern which required minimum quantities of four specific components for every meal (meat/meat alternate, grain/bread, two different fruits/vegetables and milk).

Why didn't the Department retain the old meal patterns?

The Department did retain the four-component/five-item structure of the old meal pattern, and none of the traditional quantity requirements were reduced. However, in order for meal planners to comply with the nutrition standards, it was necessary to increase calories from nonfat or low fat sources to replace the calories lost from reductions in total fat. Therefore, the requirements for fruits/vegetables and grains/breads were increased.

Why didn't the Department cut back on the requirements for meat/meat alternate and milk?

First, because these foods make substantial contributions to the nutrients in the meal. Meats and meat alternates, for example, are an important source of protein and iron; and milk provides calcium. Second, a reduction in these components, particularly the meat/meat alternate, would greatly reduce the calories available in the meal, thereby requiring even larger amounts of other components.

Won't the increases in fruits/vegetables and grains/breads be expensive for local schools?

While this system does require larger amounts of fruits/vegetables and grains/breads than the former meal pattern, data collected by USDA indicates that, on average, schools are currently serving larger portions than required for most components. This means there is opportunity to reduce some portion sizes and, thus, reduce food costs. This savings can be used to compensate for any added costs that result from increasing portion sizes in other components.

The food-based system gives meal planners considerable latitude in the kinds, and hence the cost, of the foods they serve. Moreover, to give local planners added flexibility in meeting the grain/bread requirement, one grain/bread per day may be a dessert. Also, planners have access to a wide range of meat/meat alternate products and milks. Consequently, while the food based system does not have the broad flexibility of NuMenus and Assisted NuMenus; meal planners can control costs through the food items they choose.

Why didn't the Department change the crediting practices for such nonmeat protein sources as soy and yogurt?

USDA recognizes that changes can be made that would allow increased use of soy products and yogurt in school meals. They are planning to make regulatory proposals that would expand the use of both these products in the near future. They will use the public comment already received in constructing these proposals.

Does the food-based menu planning system need to prove nutrient content for the meals?

Congress passed legislation that said schools could not be required to conduct or use nutrient analysis. However, schools are required to comply with nutrition standards, including the recommendations of the Dietary Guidelines. Therefore, when schools choose the food-based menu planning system, the regulation requires the state agency to do a nutrient analysis of one week's food service using the school's menus and supporting production records as part of a review of compliance with nutrition standards conducted at least once every five years.

Strengths

- This option is consistent with the traditional school lunch menu planning method; food service professionals will require less retraining.
- The 4 component structure is familiar to food service personnel.
- The 4 component structure may facilitate nutrition education that focuses on teaching children the importance of eating a variety of foods.
- The standardized quantity requirements facilitate uniform production by processors who sell prepared foods to the program.

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• The standardized recipes and accurate product information required will provide consistency of quality for customers and of preparation and serving methods for employees.

Limitations

• The component/quantity requirements impose a rigid structure on each meal which limits menu planner flexibility. This may have particular impact on planning meals that meet certain ethnic preferences or for vegetarians.

• There is no guarantee that numeric targets for nutrition standards are met; extensive additional guidance may be required from program administrators to compensate for this shortcoming further limiting local flexibility.

• Separate nutrition analysis has to be performed before actual compliance with the program's nutrition standards can be determined.

• The structure of the meal pattern requires overestimating nutrition needs for some in order to assure that older children's needs are met. This inhibits meal planner's ability to control cost.

• Crediting policy, which determines the foods that are allowed to count toward meeting the meal pattern requirements, is, by its nature, imprecise and restrictive. For example, yogurt is not currently creditable in the meal pattern, even though it is a nutritious food item.

Under the food-based menu planning alternative, specific food components in minimum quantities must be served for lunch as shown in the chart below.

School Lunch Meal Pattern Requirements

(minimums)

Meal Component	Minimum quantities required for school lunches				Option for Grades K-3
	Ages 1-2	Preschool	Grades K-6	Grades 7-12	
Milk (as a beverage)	6 oz.	6 oz.	8 oz.	8 oz.	8 oz.
Meat or meat alternate (quantity of the edible portion as served):					
Lean meat, poultry or fish	1 oz.	1.5 oz.	2 oz.	2 oz.	1.5 oz.
Cheese	1 oz.	1.5 oz.	2 oz.	2 oz.	1.5 oz
Large egg	1/2	3/4	1	1	3/4
Cooked dry beans or peas	1/4 cup	3/8 cup	1/2 cup	1/2 cup	3/8 cup
Peanut butter or other nut or seed butters	2 tbsp.	3 tbsp.	4 tbsp.	4 tbsp.	3 tbsp.
The following may be used to meet no more than 50% of the requirement and must be used in combination with any of the above:					
Peanuts, soynuts, tree nuts, or seeds as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternate (1 ounce of nuts/seeds=1 ounce of cooked lean meat, poultry or fish).	1/2 oz. = 50%	3/4 oz.=50%	1 oz.=50%	1 oz.=50%	3/4 oz.=50%
Vegetables/Fruits (2 or more servings of vegetables or fruits or both).	1/2 cup	1/2 cup	3/4 cup + add 1/2 cup over a week(1)	1 cup	3/4 cup
Grains/Breads must be enriched or whole grain) A serving is a slice of bread or an equivalent serving of biscuits, rolls, etc., or one-half cup of cooked rice, macaroni, noodles, other pasta products, or cereal grains.	5 servings per week—minimum of 1/2 per day(1)	8 servings per week—minimum of 1 per day(1)	12 servings per week—minimum of 1 per day(1)(2)	15 servings per week—minimum of 1 per day(1)(2)	10 servings per week—minimum of 1 per day(1)(2)

(1) For the purposes of this chart, a week equals five days.
(2) Up to one grains/breads serving per day may be a dessert.

Under the food-based menu planning alternative, specific food components in minimum quantities must be served for breakfast as shown in the chart below.

School Breakfast Meal Pattern Requirements

(minimums)

Meal Component	Minimum quantities required for school breakfasts			
	Ages 1-2	Preschool	Grades K-12	Option for Grades 7-12
Milk (fluid) as a beverage, on cereal, or both	4 oz.	6 oz.	8 oz.	8 oz.
Juice/Fruit/Vegetable: Fruit and/or vegetable; or full-strength fruit juice or vegetable juice	1/4 cup	1/2 cup	1/2 cup	1/2 cup
Select one serving from each of the following components or two from one component:				
Grains/Breads—One of the following or an equivalent combination:				
Whole-grain or enriched bread	1/2 slice	1/2 slice	1 slice	1 slice
Whole-grain or enriched biscuit, roll, muffin, etc.	1/2 serving	1/2 serving	1 serving	1 serving
Whole-grain, enriched or fortified cereal	1/4 cup or 1/3 oz.	1/3 cup or 1/2 oz.	3/4 cup or 1 oz.	3/4 cup or 1 oz. Plus an additional daily serving of one of the grains/breads above
Meat or meat alternates:				
Meat/poultry or fish	1/2 oz.	1/2 oz.	1 oz.	1 oz.
Cheese	1/2 oz.	1/2 oz.	1 oz.	1 oz.
Egg (large)	1/2	1/2	1/2	1/2
Peanut butter or other nut or seed butters	1 tbsp.	1 tbsp.	2 tbsp.	2 tbsp.
Cooked dry beans and peas	2 tbsp.	2 tbsp.	4 tbsp.	4 tbsp.
Nut and/or seeds (as listed in program guidance)(1)	1/2 oz.	1/2 oz.	1 oz.	1 oz.

(1) No more than 1 ounce of nuts and/or seeds may be served in any one meal

NUTRIENT STANDARD MENU PLANNING

(NuMenus)

What is NuMenus?

NuMenus is a menu planning system which enables meal planners to prepare nutritious, healthful meals using modern computer technology and specific nutrient information. While meals will continue to be constructed around traditional food items, meal planners are not bound by specific component and quantity requirements or USDA crediting policies. Thus, this method allows great flexibility to vary menus and is a powerful tool for measuring the impact of new products and techniques on the food service.

In order to facilitate identification of those meals that are eligible for Federal reimbursement, meals must contain at least threemenu items, one of which must be an entree and one fluid milk. Menu planners have considerable flexibility to determine what constitutes a menu item and an entree.

How does NuMenus work?

Meal planners use software approved by USDA to analyze the foods they intend to serve. The software weights the analysis to account for the actual amount of each food projected to be served. In this way, the system provides meal planners with accurate data on the nutrient and calorie levels of the meals served to children and enables them to make adjustments as needed. The software also enables meal planners to consider a variety of options in constructing menus, to respond to student preferences while still meeting the nutrition standards, to select new foods and to adjust recipes or vary portion sizes as necessary. This software includes thousands of food items ranging from single ingredients to USDA commodities to food items submitted by processors. In addition, local recipes and processed foods can be added to the data base. (See page 22 for approved nutrition analysis software.)

Since NuMenus requires computer equipment and software, won't the cost be prohibitive for smaller schools?

Many school food service managers already use personal computers capable of running NuMenus as an integral part of their business operations to perform such functions as purchasing, maintaining inventory, keeping books, and preparing claims for reimbursement. NuMenus will be another aspect of the food service managed through the computer. Some schools wishing to use NuMenus may need to purchase equipment. In most cases, however, the equipment can be purchased for relatively modest cost, and once the equipment has been purchased, it can streamline the entire food service. Thus, equipment obtained initially just to perform NuMenus can wind up paying for itself many times over during the course of its life. This is equally true of the approved software. It will be used by the meal planner for many years. (See page 21 for current computer hardware requirements.)

NuMenus requires a weighted analysis of the planned menus including the projected number of servings of each menu item. Doesn't this penalize schools for children's preferences?

NuMenus is first and foremost a tool which enables local schools to accurately determine the success of their meal service in meeting the nutrition standards. The weight is based on the estimated number of servings that will be prepared of each food offered in order to approximate the analysis of the meals actually selected. Without weighting, meal planners would have no way of knowing if adjustments need to be made or behavioral changes in food selection are occurring. Nor would they be able to determine the effect of new foods or production techniques. USDA designed the entire system to provide accurate measurements of the nutrients in the foods being provided. There is no penalty for missing the nutrient target. Rather, schools will be offered technical assistance.

Why would schools want to use NuMenus rather than a food-based system?

Nutrient analysis provides a practical method for measuring the degree to which the food service meets the nutrition standards for school meals. NuMenus also gives meal planners latitude to vary the kinds and amounts of food prepared; meal planners are no longer bound by strict USDA crediting practices. Also, NuMenus enables planners to receive immediate accurate feedback on modifications they may wish to introduce. These appli-

cations can help meal planners experiment with new products and explore ways of reducing costs while meeting the nutrition standards and keeping meals appealing.

Strengths

- Menus can be planned without regard to specific component/quantity requirements as long as meals meet nutrition standards over a week's menu cycle.
- The flexibility inherent in the system offers opportunities for cost control.
- Since nutrition analysis is an integral part of the system, menu planners know on an ongoing basis whether menus meet nutrition standards. In addition, it provides a vehicle to experiment with different approaches to menu modification.
- Allows more opportunity to respond to ethnic/vegetarian preferences.
- May offer opportunities for food service workers to upgrade professional skills in the areas of nutrition science, menu planning, and computer technology.
- Provides school districts the vehicle to secure nutrition information from food manufacturers.
- Requires standardized recipes and accurate product information that provide consistency of quality for customers and of preparation and serving methods for employees.

Limitations

- Requires the acquisition of computer hardware and software.
- Requires that staff be trained in new technologies; therefore, start-up time and initial personnel cost may be increased.
- Requires good production records to allow estimates of the amount of foods served as part of reimbursable meals.
- Requires staff time, especially during start-up, to enter local recipes and products into the computerized data base.
- Requires a method to periodically review weighting of menu items for accuracy.

ASSISTED NUTRIENT STANDARD MENU PLANNING

(Assisted NuMenus)

What is Assisted NuMenus?

Assisted NuMenus is a variation of NuMenus designed for those schools that do not have the technical resources to implement NuMenus but want to take advantage of some of its features. This option allows the menu planner to use the expertise of outside entities like other school districts, the State, or a consultant to develop a menu cycle, recipes, procurement specifications, and preparation methods that will allow the school to produce meals that meet the nutrition standards. Meals must be produced according to the specifications developed by the outside entity. Any changes made by the school district need to be reanalyzed to assure that the standards continue to be met. Schools have the option of using their existing menus as a point of departure. USDA plans to introduce a model which could also be used as a starting point.

Why would schools elect to use Assisted NuMenus?

Some food services may want to benefit from the accuracy and flexibility of NuMenus without investing in computer equipment and training. Also, some schools might view Assisted NuMenus as an interim step toward full reliance on NuMenus.

Won't schools electing to use Assisted NuMenus be subject to an inflexible system imposed by an outside entity?

The whole purpose of Assisted NuMenus is to allow schools to benefit from the flexibility of NuMenus even though they may not have the resources to operate the computer program themselves. The outside party can start with the school's own menus and recipes, and the school can have the menus that are developed modified and reanalyzed if they prove to be unsatisfactory.

Consequently, the school will continue to have control over the meals they serve and will not be subject to outside decisions unless they choose to be.

What will USDA do to assist with this option?

USDA is developing model menu cycles for lunches and breakfasts with accompanying recipes, food product specifications and recommended food preparation methods. Schools and consultants can use these guidance materials as a starting point for both NuMenus and Assisted NuMenus.

Strengths

- Same planning flexibility as NuMenus; opportunities exist for lowering food costs and increasing responsiveness to ethnic/vegetarian preferences.
- Schools may be able to use their existing meal service as a base.
- Offers training opportunities for food service personnel; may allow gradual transition to the more sophisticated NuMenus technology.
- Provides opportunity to take advantage of the experience of others who have successfully implemented meal programs that comply with the nutrition standards.
- Requires standardized recipes and accurate product information that provide consistency of quality for customers and of preparation and serving methods for employees.

Limitations

- Obtaining the service creates a dependency on outside assistance and may require a financial investment.
- Menus, recipes, etc. must be followed exactly as designed.
- Inhibits experimentation; changes can be made only if menu designer provides analytical support.
- Same need for production records as with NuMenus.

For nutrient standard and assisted nutrient standard menu planning, schools must provide calorie and nutrient levels for school lunches (offered over a school week) for the required grade groups specified in the following chart.

Minimum Requirements for Nutrient and Calorie Levels for School Lunches/Nutrient Analysis (school week averages)

Nutrients and energy allowances	Minimum Requirements			Optional
	Preschool	Grades K-6	Grades 7-12	Grades K-3
Energy allowance/calories	517	664	825	633
Total fat (as a percent of actual total food energy)	(1)	(1)	(1)	(1)
Saturated fat (as a percent of actual total food energy)	(2)	(2)	(2)	(2)
Protein (g)	7	10	16	9
Calcium (mg)	267	286	400	267
Iron (mg)	3.3	3.5	4.5	3.3
Vitamin A (RE)	150	224	300	200
Vitamin C (mg)	14	15	18	15

(1) Not to exceed 30 percent over a school week.

(2) Less than 10 percent over a school week

At their option, schools may provide for the calorie and nutrient levels for school lunches (offered over a school week) for the age groups specified in the following chart or may develop their own age groups and their corresponding levels in accordance with guidance material provided by USDA. However, if only one age or grade is outside the established levels, schools may use the levels for the majority of children regardless of the option selected.

Optional Minimum Requirements for Nutrient and Calorie Levels for School Lunches/Nutrient Analysis (school week averages)

Nutrients and energy allowances	Ages 3-6	Ages 7-10	Ages 11-13	14 and above
Energy allowance/calories	558	667	783	846
Total fat (as a percent of actual total food energy)	(1)	(1)	(1)	(1)
Saturated fat (as a percent of actual total food energy)	(2)	(2)	(2)	(2)
Protein (g)	7.3	9.3	15.0	16.7
Calcium (mg)	267	267	400	400
Iron (mg)	3.3	3.3	4.5	4.5
Vitamin A (RE)	158	233	300	300
Vitamin C (mg)	14.6	15.0	16.7	19.2

(1) Not to exceed 30 percent over a school week.

(2) Less than 10 percent over a school week

Note: *See the complete regulations for a more detailed discussion of compliance with minimum nutrition requirements when a school has students in more than one age or grade group.*

For nutrient standard and assisted nutrient standard menu planning, schools must provide the calorie and nutrient levels for school breakfasts (offered over a school week) for the required grade groups specified below.

Minimum Requirements for Nutrient and Calorie Levels for School Breakfast (school week averages)

Nutrients and energy allowances	Preschool	Grades K-12	Option for Grades 7-12
Energy allowance/calories	388	554	618
Total fat (as a percent of actual total food energy)	(1)	(1)	(1)
Saturated fat (as a percent of actual total food energy)	(2)	(2)	(2)
Protein (g)	5	10	12
Calcium (mg)	200	257	300
Iron (mg)	2.5	3.0	3.4
Vitamin A (RE)	113	197	225
Vitamin C (mg)	11	13	14

(1) Not to exceed 30 percent over a school week.

(2) Less than 10 percent over a school week

At their option, schools may provide for the calorie and nutrient levels for school breakfasts (offered over a school week) for the age groups specified in the following chart or may develop their own age groups and their corresponding levels in accordance with guidance material provided by USDA. However, if only one age or grade is outside the established levels, schools may use the levels for the majority of children regardless of the option selected.

Optional Minimum Requirements for Nutrient and Calorie Levels for School Breakfast (school week averages)

Nutrients and energy allowances	Ages 3-6	Ages 7-10	Ages 11-13	14 and above
Energy allowance/calories	419	500	588	625
Total fat (as a percent of actual total food energy)	(1)	(1)	(1)	(1)
Saturated fat (as a percent of actual total food energy)	(2)	(2)	(2)	(2)
Protein (g)	5.5	7.0	11.25	12.5
Calcium (mg)	200	200	300	300
Iron (mg)	2.5	2.5	3.4	3.4
Vitamin A (RE)	119	175	225	225
Vitamin C (mg)	11.0	11.25	12.5	14.4

(1) Not to exceed 30 percent over a school week.

(2) Less than 10 percent over a school week

Note: *See the complete regulations for a more detailed discussion of compliance with minimum nutrition requirements when a school has students in more than one age or grade group.*

COMPLIANCE

COMPLIANCE WITH THE NUTRITION STANDARDS

In the School Meal Programs

The Healthy Meals for Healthy Americans Act, passed by Congress in 1994, requires that schools choose a menu planning system and implement the updated nutrition standards by the 1996-97 school year. States will be able to grant implementation waivers; but implementation must occur by the 1998-99 school year.

Will schools be penalized if they can not meet the nutrition standards within these time frames?

No. USDA is aware that schools need the cooperation of students, parents and educators before they can be successful in meeting the revised nutrition standards, and that this will take time. Therefore, the USDA regulation does NOT contain penalties of any kind for failing to meet the standards as long as schools are making an effort to comply.

What will States or USDA do if they find that a school is not in compliance?

The regulation requires that states offer support and technical assistance to schools that are having difficulty meeting the nutrition standards. USDA expects that a corrective action plan will be developed to address the problems that are being encountered. USDA is in the process of developing a variety of support materials and activities that should prove useful to state and local program operators.

What support is USDA providing?

USDA has undertaken a variety of technical assistance activities. For example, training will be conducted in each Region in the near future. This "train the trainer" course is being designed for state staff and will help build a cadre of professionals that can offer training to local food service personnel on all three menu planning options and meeting the Dietary Guidelines. In addition, in fall 1995 USDA will be releasing new recipes accompanied by a training guide and promotion plan. These materials have been developed specifically to support serving meals that meet the Dietary Guidelines. USDA is working on a cooperative agreement with the Food Service Management Institute to operate a 1-800 "help line" for local program operators. This is just a sample of the many plans that are underway.

What kind of monitoring do states have to do to measure compliance with the revised nutrition standards?

It is important to note at the outset that monitoring for compliance with nutrition standards is not based on fiscal sanctions. In all instances, when states find that schools are having difficulty meeting the standards, corrective action plans will be developed. It will only be in that rare case where a school refuses to initiate action that would move them toward compliance with the regulation that states will initiate fiscal action for failing to meet nutrition standards.

The new regulation changes the frequency of state reviews from every four to five years. This 20 percent reduction in mandatory review activity is intended to provide States with additional time to provide support to school districts in implementing the revised nutrition standards.

The nature of a state's review will depend on the menu planning option the school selects. When schools choose NuMenus or Assisted NuMenus, the state will review whether meals are being served according to the menus that have been developed and whether the nutrition analysis is being done properly. When the food-based option is selected, states will, as they do now, review whether component and quantity requirements are being met and will also perform a nutrition analysis to determine the degree to which the school is using the meal pattern to meet the nutrition standards.

If alternative compliance measures become available, school nutrition personnel will be notified.

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"Nutrition Power"

Training Initiative Stresses Lifelong Nutritional Health

Nutrition Power is a comprehensive training initiative to improve the learning readiness and lifelong nutritional health of Wisconsin children.

A student who is healthy is better able to focus on learning. Schools have the opportunity, through a comprehensive approach to health, to help young people acquire the knowledge and skills to make healthy choices. Nutrition Power gives schools and other stakeholders an option to effectively address the nutritional health issues of Wisconsin children.

The School Nutrition/Food Service Staff are in a unique position to improve learning readiness and lifelong nutritional health of children by:

- providing nutritious meals to students and school staff;
- promoting healthy dietary decision-making through the offering of a variety of food choices;
- providing nutrition education to students, staff and parents;
- creating a healthful environment within the school cafeteria, through posters, games, healthful food choices, role modeling, asking for input from students, parents and staff, etc.; and
- supporting nutrition education in the classroom and other health-promoting activities within the school.

Why was Nutrition Power developed?

In response to the Healthy Meals for Healthy Americans Act of 1994, representatives from four organizations formed a Training and Marketing Committee in December, 1994 to determine a strategy for meeting the new regulations. These organizations were the Wisconsin School Food Service Association, the Department of Public Instruction, the University of Wisconsin-Cooperative Extension, and the Wisconsin Technical College System. After several meetings, the Dairy Council of Wisconsin was invited and agreed to be a collaborative member of this group.

From this Training and Marketing Committee, Nutrition Power was born. The training initiative stresses the view that nutrition is an integral part of the school health program, an essential component of a health-promoting environment, and a learning laboratory for nutrition instruction.

Who are the stakeholders in Nutrition Power?

The ultimate stakeholders are children. Nutrition Power focuses on the following stakeholders to meet the goal of this initiative (see graphic on page 14):

- The School Nutrition Services
- The School Team
- The Family and Community

How does Nutrition Power Work?

The four primary components (see graphic on page 14) of the comprehensive training initiative are:

- Effective nutrition education
- Healthy, appealing food choices to allow students and staff to make healthy dietary decisions.
- Health promoting environments
- Partnerships—We can't do it alone.

Nutrition Power's design includes three main activities:

- self-assessments to determine the progress made to date in the areas identified above;
- workshops targeting each of the stakeholders to develop individualized strategic plans for meeting the ultimate goals of improving the learning readiness and lifelong nutritional health of the children they serve; and
- skills development through courses and materials to meet the needs identified in the self-assessment and the strategic planning workshops.

Highlights of Nutrition Power include the following:

- A primary strength of Nutrition Power is that it is a collaboration of five organizations working to improve the nutritional health of children.
- It is an optional initiative for schools and programs in-

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terested in better meeting the health and nutrition needs of students.

- Schools or programs may get involved with Nutrition Power at the point that they feel would benefit them the most. For example, if the school nutrition services staff feel the most important need they currently have is to develop a plan and develop the skills necessary to meet the dietary guidelines, then they should start with the strategic planning workshop for school nutrition/food service staff. If the school principal believes that the team approach is the appropriate place to start, then the school team should attend the strategic planning workshop for the school team.
- The strategic planning workshops:
  - are 3 - 4 hours in length.
  - are offered throughout the state, or if preferred, on site as resources permit.
  - are offered free of charge.
- Skills development courses/workshops will be offered at no charge or minimal charge to participants.

What will be covered in the strategic planning workshops?

The focus of the workshop for school nutrition/food service personnel is to help these individuals develop an individualized strategy for implementing the Dietary Guidelines for Americans (DGA). An effort also is made to identify the resources and/or classes needed for skills development in order to put that strategy into action.

The goal of the workshop for school-based teams is to assess and develop strategies to improve:

- the school environment;
- the curriculum and instruction; and
- the classroom-cafeteria connections to reflect healthy lifestyles and messages.

The school-based team includes the administrator, principal, a teacher, a health person, the food service director, and others designated by the school.

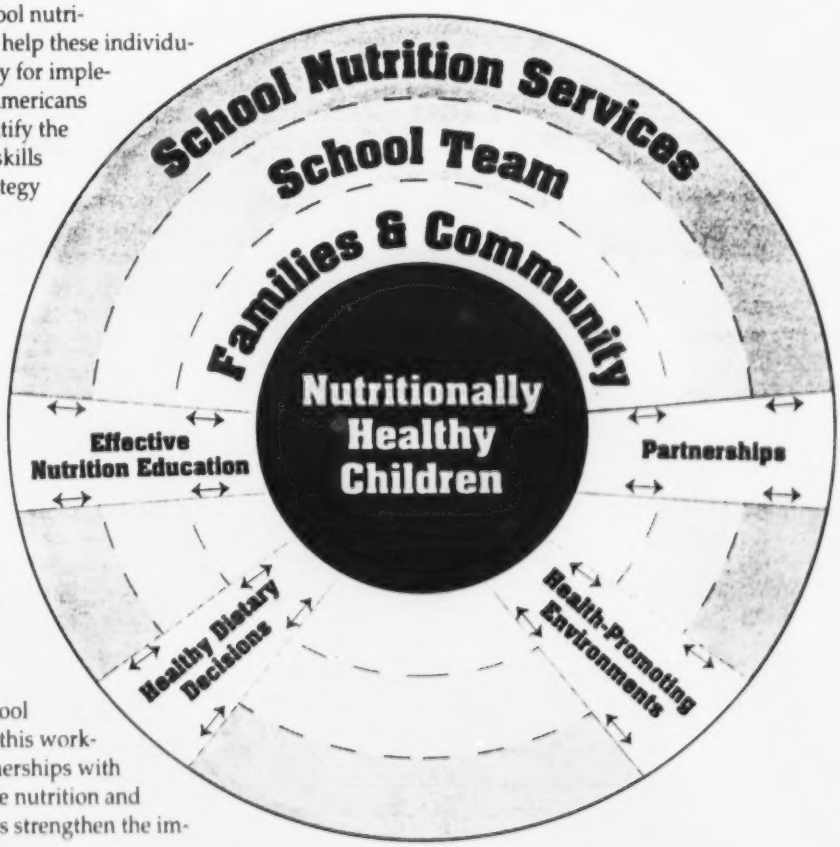
The third workshop involves the School Team—Community Partnerships. In this workshop, the school team develops partnerships with community residents interested in the nutrition and health of children. These partnerships strengthen the impact of health education and role modeling experiences in the schools.

What is the role of each of the sponsors of Nutrition Power?

Nutrition Power requires the collaborative efforts of many people and organizations. These include the:

Dairy Council of Wisconsin, which has six consultants to facilitate the strategy development at the three levels—the school nutrition staff, the school team, and the school team-community partners. This will be done in many workshops throughout the state, as the demand dictates. In addition, the Dairy Council will be involved in the curriculum development for these workshops.

University of Wisconsin Cooperative Extension, which has provided input and feedback during the development of Nutrition Power. UW Cooperative Extension will be instrumental in the curriculum development for the workshops and the skills development courses.



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Wisconsin Department of Public Instruction through

- The Nutrition Education and Training (NET) Program, which is organizing and coordinating the collaborative efforts of the organizations involved;
- The Bureau for Food and Nutrition Services, whose consultants are involved in providing information and technical assistance for this initiative to the school nutrition staff;
- The Comprehensive School Health Initiative, which is supporting the school team efforts both financially and through coordination with other team initiatives.

Wisconsin Technical College System (WTCS), by providing the infrastructure for the skills development component of this initiative through its various campuses and other vehicles, such as distance learning, to reach a large number of participants for classes and seminars. The WTCS provides a means for the school nutrition staff to receive the training needed to carry out the strategies for DGA implementation that they have developed. WTCS staff will be active in curriculum development and training of trainers for the skills development courses.

Wisconsin School Food Service Association (WSFSA), which is supporting this initiative through the organization of and access to its members; and through input into the content, format, and direction that the initiative will take. In addition, WSFSA will promote the strategic planning workshops and skills development courses for its members and provide incentives and encouragement for its members to become instructors for the skills development courses.

What types of skills development courses and materials will be available?

Skills development courses will be offered through the Wisconsin Technical College System. Course suggestions for school nutrition/food service staff include:

- Dietary Guidelines for Americans;
- menu planning to incorporate the dietary guidelines
- recipe standardization (including recipe adjustment and developing standardized recipes in a food lab);
- food production and service;
- nutritional analysis (food-based and nutrient-based);
- computer skills;
- team building; and
- marketing.

Courses to supplement the other strategic planning workshops will be offered/developed as needed. In addition to the course selections, other resources and materials will be identified in each of the workshops.

OLD VERSUS NEW

COMPARISONS OF MAJOR PROVISIONS OF NEW SCHOOL MEALS REGULATIONS TO PREVIOUS REGULATION

OLD	NEW
Nutrition Standards	
• The meal pattern was assumed to produce meals that contributed: – 1/3 essential RDAs and calories for lunch. – 1/4 essential RDAs and calories for breakfast, over time.	• 1/3 essential RDAs and calories for lunch and 1/4 essential RDAs and calories for breakfast. • Dietary Guidelines: – No more than 30% calories from fat. – Less than 10 percent calories from saturated fat. – Moderate levels of sodium and cholesterol. – Attention to fiber content of meals. • Compliance measured over a school week.
Comment: Standards are updated for the first time in 50 years to reflect the scientific consensus regarding the important role the Dietary Guidelines play in promoting long term health and prevention of many life threatening diseases like stroke, heart disease and some cancers. USDA's cost analysis indicated that meals that meet these new standards can be produced within current reimbursement rates.	
Menu Planning Systems	
• Meal Pattern.	• Food Based System (Enhanced Meal Pattern), • Nutrient Standard Menu Planning, or • Assisted Nutrient Standard Menu Planning.
Comment: School Food Authorities (SFAs) now have three systems from which to choose rather than just one. Each system has its own attributes; SFAs can choose based on their unique circumstances.	

OLD	NEW
Food Based Menu Planning Option (Meal Pattern Requirements)	
• Four components/five items. – 2 oz. of cooked lean meat or meat alternate daily (Option: 1.5 oz. K-3) – 3/4 cups of fruits/vegetables daily (2 items) – 8 servings (weekly) of bread/ bread alternate – 1 cup of milk, at least whole and unflavored low fat must be offered	• Four components/five items. – 2 oz. of cooked lean meat or meat alternate (Option: 1.5 oz. K-3) – K-6, 3/4 cups of fruits/vegetables daily plus 1/2 cup weekly; and 7-12, 1 cup of fruits/vegetables daily – K-6,12 servings of bread/bread alternate weekly; and 7-12, 15 servings weekly (one daily serving may be a dessert) – 1 cup of milk; offer a variety; if past consumption is less than 1 % of a type, do not have to offer
• Option to vary portion sizes by age (smaller offerings of fruits/vegetables and meat; larger portions of bread).	• Two age/grade categories required (K-6 and 7-12); option to serve smaller portion sizes K-3.
• Use USDA crediting procedures (Crediting defines how much a serving of different foods can contribute to the prescribed portion size).	• Use USDA crediting procedures (Crediting defines how much a serving of different foods can contribute to the prescribed portion size). • Makes desserts eligible for credit as bread/grain.

Comment: Portion sizes have been increased for fruits, vegetables, and grains to maintain appropriate calorie levels through the use of lower fat foods. These changes also respond to the need to increase fiber and lower cholesterol in the diet. In addition, the new requirements to provide a minimum of two portion sizes recognizes that the nutrient needs of young children and adolescents are different.

USDA's impact analysis indicated that the changes are cost-neutral compared to current practice because the average SFA is providing larger portion sizes of the meat/meat alternate, fruit and vegetables, and grains/bread component than is now required. Smaller portion sizes for younger children and revisions to crediting policies to credit some desserts also contribute to the cost neutral effects.

OLD	NEW
Nutrient Standard Menu Planning Option (NuMenus)	
• No existing provisions.	• Must offer at least three items; one item must be milk and one item must be an entree. • No portion size requirements; instead, must meet nutrition requirements based on analysis of nutrient content of foods offered. • Use nutrient analysis software—that USDA has reviewed for compliance with regulations—which include use of standard data base of nutrient values for food. • When choices are offered, weight analysis proportionate to what is offered to students (e.g. for 100 students if 75 servings of corn and 25 servings of spinach are offered—weight 3:1). • Update analysis when proportions of offerings change. • Use standardized recipes. • Nutrient analysis records must be retained for review.

Comment: USDA received considerable public comment that urged reducing the proposed standards for doing nutrient analysis, particularly the requirement that the analysis be weighted. Since SFAs have the option to use the food based menu planning system if they decide the NuMenus is too challenging, it was determined that it was preferable to maintain most of the standards as proposed so that an accurate analysis could be produced. This accuracy level may benefit SFAs by allowing them to track changes in children's eating patterns over time and the effects of changing menus and recipes. Two changes were made, however, in response to comments. First, the nutrient analysis for lunch and breakfast may be combined (at the SFAs option). Second, a new age/grade option was developed that allows for consistency with the grade/age standard for the food based option. These two changes offer greater flexibility to SFAs. USDA believes that when SFAs become familiar with the software, many of their concerns relative to the complexity of NuMenus will diminish.

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OLD	NEW
Assisted Nutrient Standard Menu Planning Option	
• No existing provisions.	• Allows schools/districts to have menus developed and nutrient analysis performed by others (like states or consultants). The resulting menu cycle must meet nutrition standards and abide by the same procedures that govern the nutrient standard method.
Comment: USDA plans to provide model menus and recipes that will assist those SFAs that choose this option.	
Offer Versus Serve (OVS)	
• High school students may decline up to two of the five items. Elementary school students may at local option decline up to a maximum of two items.	• Same policy if Food Based Menu Planning option is chosen. • For Nutrient Standard Menu Planning and Assisted Nutrient Standard Menu Planning, students in schools that operate an OVS system must take at least two items and may decline no more than two items when four or more items are offered.
Comment: The final rule makes OVS similar regardless which menu planning system is chosen.	
Compliance Monitoring	
• Coordinated Review Effort (CRE) must be conducted once every four years in each school district.	• CREs must be conducted every five years in each school district. • States must conduct a nutrition analysis for those districts that use a food based system once every five years-to check compliance with the Dietary Guidelines. • States must review the nutrient analysis prepared by the school districts in those districts that opt for Nutrient Standard Menu Planning or Assisted Nutrient Standard Menu Planning. • States must offer technical assistance and enter into corrective action plans with those districts found to be out of compliance with nutrition standards.
Comment: USDA has reduced the State review burden by 20 percent to recognize the new requirements to offer technical assistance and provide oversight in implementing the Dietary Guidelines.	

OLD	NEW
Administrative Requirements	
• Schools must use specific edit checks prescribed by USDA in preparing claims.	• Schools found to produce accurate claims for reimbursement may design their own edit checks.
• Separate records must be maintained to demonstrate nonprofit status of meal programs.	• Normal business records can be used to demonstrate nonprofit status for meal reimbursement.

Comment: Both changes offer SFAs flexibility to use or develop their own systems rather than being constrained by federal requirements.

Miscellaneous	
	• Schools are **encouraged** to have an adequate number of lunch periods and adequate time for students to eat.
	• Schools are **encouraged** to make information available regarding the nutrition content of meals and their efforts to meet nutrition standards.

Comment: USDA hopes (but is not requiring) that schools extend lunch periods to allow children adequate amounts of time to eat, as this has been described as a barrier to students making healthy food choices and even participating in the school lunch program. In addition, USDA is hopeful that schools will inform students and parents of the nutritional content of meals as a way of promoting nutrition education and building community support for a healthy school meals program. Further regulations will be proposed in the near future to implement the provisions of P.L. 103-448 regarding nutrition disclosure.

COMPUTER HARDWARE REQUIREMENTS

These are the minimum computer system requirements to support Nutrient Standard Menu Planning, computer-based training activities and tutorials. This information will assist you in the purchase of quality computer equipment that functions at an optimal level.

If School districts are purchasing new computer equipment for Nutrient Standard Menu Planning, a 486DX2-66 (or higher) based PC is recommended. In addition, computer support staff in schools have reported to the USDA's Food and Consumer Service that additional memory would be necessary to run food service software programs. Therefore, we recommend computers with at least 8 MB of RAM.

A DOS system would require:

386DX 20MHz based PC with 4 MB of RAM

Standard VGA monitor

Operating system: DOS 3.3 or higher

Printer

A Windows system would require:

386DX 20MHz based PC with 4 MB of RAM

Standard VGA monitor

Operating system: DOS 3.3 or higher, Windows 3.1

Printer

Mouse

A Macintosh system would require:

System 6.0 or higher

Memory requirement of 4 MB or higher

Soft PC, Soft Windows (to operate DOS or Windows programs on Macintosh systems)

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USDA Approved Software for Nutrient Analysis

To date, three software programs have been approved by USDA for nutrient analysis of lunch and breakfast programs by school districts and states. As additional software is approved, school nutrition personnel will be advised. Software companies or others that want to develop school food service software systems should request information from USDA's Food and Consumer Service (FCS). FCS will evaluate and approve software against specifications to ensure they:

- incorporate the National Nutrient Database for Child Nutrition Programs.
- compute a weighted nutritional analysis of meals.
- convert the nutritional analysis information on any label to 100 grams.
- create and analyze recipes.
- provide for a local database into which local recipes and locally available processed foods can be loaded for analysis.

Below are brief descriptions of the computer hardware requirements of the approved packages.

Computer Assisted Food Service (CAFS), Version 1.3

- DOS, Hard disk with at least 5 to 10 MB available.
- Contact: Mr. Andrew Gilich, President, 601/374-7544

LunchByte Systems (Nutrikids), Version 5.0

- Operates on all PC compatible systems running MS-DOS Version 3.0 or higher. Minimum 512K RAM and a hard disk with at least 3.5 MB available. Monochrome or color monitors. Uses dot matrix or laser printers. Also available on the Macintosh by using in conjunction with a program called Soft PC.
- Contact: Paul Moriarty, 716/663-1670 or 800/724-9853

School Nutrition Accountability Program (SNAP), Version 2.7L

- Minimum Hardware/Software Requirements:
  - 286, 386, 486 or Pentium computer
  - at least 1 MB of RAM
  - 15 MB of hard disk space
  - Monochrome, color, or VGA monitor
  - MS-DOS 5.0 or higher
  - Available memory of at least 600K
- Recommended Hardware/Software Requirements:
  - 386DX-25
  - 4 MB of RAM
  - 15 MB of hard disk space
  - VGA color monitor
  - MS-DOS 6.2
  - Mouse
  - Available memory of at least 600K (614,400 bytes)
- Designed to operate in a multi-user/multi-tasking network environment. The program also operates in a DOS Window.
- Contact: Mr. Chip Goodman, 310/315-9940

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